

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**FILED**

UNITED STATES OF AMERICA

v.

CASE NUMBER:

DEC - 5 2013

DEC 5 2013

THOMAS G BRUTON  
CLERK, U S DISTRICT COURTMALCOLM CARPENTER and  
JUSTIN WILLIAMS13CR 930  
MAGISTRATE JUDGE COLE

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about December 4, 2013, at Homewood, in the Northern District of Illinois, Eastern Division, the defendants violated:

*Code Section*Title 18, United States Code, Section  
2113(a)*Offense Description*

by force, violence, and intimidation, took from the person and presence of bank employees approximately \$80,288 in money belonging to, and in the care, custody, control, management, and possession of Bank of America, 18460 Governors Highway, Homewood, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

  
R. BRIAN WENTZSpecial Agent, Federal Bureau of Investigation  
(FBI)

Sworn to before me and signed in my presence.

Date: December 5, 2013City and state: Chicago, Illinois  
JEFFREY COLE, U.S. Magistrate Judge

Printed name and Title

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

ss

AFFIDAVIT

I, R. BRIAN WENTZ, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed for approximately 10 years. I am assigned to the FBI Chicago Division Field Office, South Resident Agency, Violent Crimes Squad. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that MALCOLM CARPENTER and JUSTIN WILLIAMS have violated Title 18, United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CARPENTER and WILLIAMS with bank robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, surveillance photographs and videos, interviews with bank personnel and other witnesses, and documents provided by bank personnel.

### **The December 4, 2013, Bank Robbery**

4. On or about December 4, 2013, at approximately 10:33 a.m., a robbery occurred at the Bank of America branch located at 18460 Governors Highway, in Homewood, Illinois ("the Bank"). Bank of America's deposits at that time were insured by the Federal Deposit Insurance Corporation.

5. According to a victim teller ("Teller A"), Teller A was working behind the teller counter with one other victim teller ("Teller B"). According to Teller A, a black male ("Robber A") walked into the Bank alone and approached the teller counter. According to Teller A, Robber A asked to speak with a manager so he could open a new corporate bank account.

6. According to the bank manager, a second black male ("Robber B") then entered the Bank and walked into the first cubicle office, where the manager was talking on the phone. According to the manager, Robber B pulled out a stainless steel semi-automatic gun, pointed it at the manager, and told him to "get the fuck off the phone."

7. According to Teller A, Robber A pulled out a black handgun and yelled "this is a robbery, nobody move." According to the manager, Robber A and Robber B walked the manager behind the teller line, and Robber B told the bank employees to get on the floor. According to the manager, Robber A took the manager to the vault and told him to open it. Photo and video surveillance shows that Robber A pointed the gun at the manager as the manager attempted to open the vault. According to

the manager, the vault required two people to open it, and so Teller A assisted the manager in opening the vault.

8. According to Teller A and the manager, when the vault was open, Robber A pulled a light-colored canvass bag from his left pocket and told the manager to fill it with money from the vault. The manager described the bag as having two straps with a green stripe at the bottom. According to Teller A and the manager, in the process of filling the bag, an anti-theft device was placed in the bag. As the manager was filling the bag with money, Robber A stated, "Don't take it personal."

9. According to Teller A, Robber A then walked back into the teller area and told Teller A to open her teller drawer. Robber A emptied the teller drawer and put the contents into the bag. Robber A asked the Bank employees, "Where's the rest of it?" Robber A and Robber B then walked out of the bank.

10. During the robbery, a Bank employee was on the telephone with an employee from another Bank of America branch in Oak Lawn, Illinois. The employee at the Oak Lawn branch determined that a robbery was occurring and called 911 on behalf of the Bank.

11. Teller A described Robber A as a black male, wearing a dark outfit that resembled a security guard uniform and a black skull cap. He was also described as being between 5'5" and 5'7", with a medium build. Teller B described Robber A as a black male in his late 20s, with a light beard, wearing what appeared to be a

security uniform and a black cotton hat. Teller B also stated that Robber A is approximately 5'5" with a medium build.

12. The manager described Robber B as a black male wearing a blue shirt, dark pants, and a black skull cap, with long dreads coming out of the cap. Teller A stated that Robber B wore a blue shirt and dark pants, and was between 5'5" and 5'7", with a medium build.

13. Agents recovered surveillance photographs and videotape from the Bank. Still frames from the video-surveillance system reveal that Robber A was a black male, who wore a blue zip-up jacket with a security-type badge on the chest and both arms and a dark skull cap that appears to contain a large amount of hair, and that he held a dark-colored semi-automatic style handgun and carried a light-colored bag with straps. The still frames show that Robber B was a black male, who wore a light-colored button-up shirt with pockets on the front and a gray scarf around his neck, and carried a small silver handgun.

14. Your affiant spoke with a witness who lives in close proximity to the Bank. The witness told your affiant that she saw Robber A and Robber B had run towards a nearby apartment building on Cherry Creek Drive, in Homewood. Agents also viewed a surveillance video of the outdoor area behind the building in which the Bank is located and observed Robber A and Robber B running towards that nearby apartment building. Next to the apartment building, officers stopped a black male ("Individual A"), who possessed a large amount of currency and a key to a gray 1998 Volvo GLT.

15. FBI SWAT teams and the local police department removed residents from the apartment building and searched the building for Robber A and Robber B. The agents and officers interviewed residents of the building. One resident remarked that a gray Volvo parked directly in front of the building did not belong there.

16. Agents and officers approached the gray Volvo. Your affiant noticed that the windows on the car were heavily fogged over. SWAT members ordered the occupants out of the vehicle, and after several minutes two men exited the vehicle. The men were identified as CARPENTER and WILLIAMS.

17. Utilizing the key obtained from Individual A, a safety sweep was completed of the trunk area. After it was determined safe, agents observed in plain view in the Volvo's trunk a dark security jacket, appearing to be identical to the one worn by Robber A during the robbery, and a bag containing a large amount of United States currency. The bag, which was light-colored canvass with a green stripe, appeared identical to the bag that was observed on video surveillance and consistent with that described by witnesses.


18. Inside the bag, agents found \$80,288 in United States currency. An audit by the Bank found that Robber A and Robber B had taken \$80,288 in United States currency. Agents also found the Bank's anti-theft devices in the bag.

19. Agents also found two semi-automatic handguns — a silver Taurus and a black Smith and Wesson — hidden behind the radio in the gray Volvo. Both

guns had magazines with cartridges loaded. The black handgun had a round of ammunition in the chamber.

20. Your affiant has reviewed the Bank's surveillance photos, and those photos clearly identify CARPENTER and WILLIAMS as the robbers.

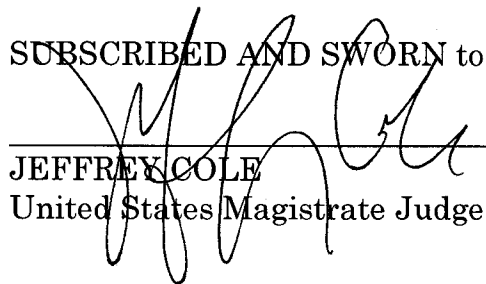
FURTHER AFFIANT SAYETH NOT.



R. BRIAN WENTZ

Special Agent, Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on December 5, 2013.



JEFFREY COLE

United States Magistrate Judge